

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FLAVIA BENITEZ,)
Plaintiff,)
)
v.) C.A. No: 04-11959-NG
)
SODEXHO MARRIOTT SERVICES,)
Defendant.)
)

AFFIDAVIT OF BRIAN M. HANEY

I, Brian M. Haney, having first been duly sworn, hereby depose and state:

1. I am an attorney with the law firm of Cooley Manion Jones LLP, licensed to practice law in Massachusetts and admitted to the United States District Court for the District of Massachusetts.
2. I represent Sodexho Marriott Services in the above-referenced matter.
3. A true and accurate copy of the following documents are attached hereto as Attachments:
 - A. "Medical Records Authorization";
 - B. Scheduling Order of February 2, 2006 (Dein, USMJ);
 - C. "Authorization To Disclose Information To";
 - D. April 14, 2006 letter to Flavia Benitez from Brian M. Haney (with enclosure)
 - E. April 18, 2006 letter to Flavia Benitez from Brian M. Haney (with enclosure)
 - F. April 26, 2006 letter to Flavia Benitez from Brian M. Haney;
 - G. Scheduling Order and Order on Plaintiff's Motions to Compel, for Protective Order, for Appointment of Counsel and for a Technical Legal Interpreter of June 6, 2006 (Dein, UDMJ);
 - H. Invoice No. P599954 of Medical Record Associates, Inc.; and

I. Authorization to Obtain, Use, and Disclose Protected Health Information completed by Flavia Benitez for "Cambridge Health."

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 22nd DAY OF JUNE, 2006.

/s/ Brian M. Haney

Brian M. Haney